

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CENTRO PRESENTE, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

)
)
)
)
)
)
)
)
)
)

No. 1:18-cv-10340-DJC

**PLAINTIFFS’ UNOPPOSED MOTION FOR LEAVE TO FILE REPLY
MEMORANDUM IN FURTHER SUPPORT OF PLAINTIFFS’ MOTION
TO COMPEL RESPONSES TO WHITE HOUSE DISCOVERY REQUESTS**

Plaintiffs, through their undersigned counsel, respectfully move for leave to file a brief, ten-page reply in further support of Plaintiffs’ Motion to Compel Responses to White House Discovery Requests, ECF 74 (the “Motion”) pursuant to L.R. 7.1(b)(3). Plaintiffs’ proposed reply memorandum is attached to this motion as Exhibit A. Defendants have assented to Plaintiffs’ request for leave to submit a reply memorandum.

Plaintiffs’ proposed reply will address Defendants’ arguments and omissions in their Opposition to Plaintiffs’ Motion to Compel Discovery from the White House, ECF 77 (the “Opposition”). The Opposition raises constitutional issues. Plaintiffs seek to demonstrate that Defendants are not correct about the legal framework for evaluating claims of executive privilege and burden where discovery requests are directed towards the President and his agents in the White House. Plaintiffs believe that their reply memorandum will be of assistance to the Court. It is limited to ten pages.

For the reasons set forth above, Plaintiffs respectfully request that the Court grant Plaintiffs' unopposed request for leave to file the reply memorandum attached as Exhibit A.

Respectfully submitted,

CENTRO PRESENTE, *et al.*

/s/ Allison S. Ercolano

Oren Sellstrom (BBO# 569045)
Oren Nimni (BBO #691821)
Iván Espinoza-Madrigal (Admitted *Pro Hac Vice*)
LAWYERS FOR CIVIL RIGHTS
61 Batterymarch Street, 5th Floor
Boston, Massachusetts 02110
(617) 988-0624

Dated: April 1, 2019

Eric J. Marandett (BBO# 561730)
Carlos J. Perez-Albuerne (BBO# 640446)
Kevin P. O'Keefe (BBO# 697101)
Xing-Yin Ni (BBO# 693876)
Leah R. Milbauer (BBO# 703717)
Margaret J. Burnside (BBO# 698763)
Allison S. Ercolano (BBO# 698601)
Natalia Smychkovich (BBO# 699289)
CHOATE, HALL & STEWART LLP
Two International Place
Boston, Massachusetts 02110
(617) 248-5000

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Pursuant to L.R. 7.1(a)(2), I hereby certify that on April 1, 2019, I conferred via email with counsel for the Defendants, Adam Kirschner, who does not oppose the filing of a reply memorandum in further support of Plaintiffs' Motion to Compel Responses to White House Discovery Requests.

/s/ Allison S. Ercolano

Dated: April 1, 2019

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Allison S. Ercolano

Dated: April 1, 2019